

TAB 1

1 Q. Have you ever been known by any other name
2 besides Diane Poland?

3 A. Diane Wilson.

4 Q. When did you change your name?

5 A. When I was divorced several years ago. I think
6 it was 1992.

7 Q. What's your Social Security number?

8 A. 187-54-4065.

9 Q. Where were you born?

10 A. Philadelphia.

11 Q. What is the date of your birth?

12 A. 8/29/1964.

13 Q. Your race is African-American?

14 A. Yes.

15 Q. Where do you currently live?

16 A. I live in New Castle, Delaware.

17 Q. What's your address?

18 A. Number 12 Berks Court, New Castle, Delaware,
19 19720.

20 Q. Do you rent or own?

21 A. Own.

22 Q. How long have you lived there?

23 A. Since 1996.

24 Q. Where did you live before that?



1 Q. Attaching the card reader?

2 A. Mm-hmm.

3 MR. MARTIN: Yes?

4 THE WITNESS: Yes.

5 MR. SEEGULL: Off the record.

6 (Discussion off the record.)

7 BY MR. SEEGULL:

8 Q. Was there any computer programming involved in
9 that?

10 A. Some, yes. I had to -- depending on what the
11 client needed and who needed access, I put that in the
12 system before I would go out and install the readers.

13 Q. Okay.

14 A. So when someone swiped the card, it would admit
15 them or decline them.

16 Q. So you would have to use certain software
17 application?

18 A. Yes.

19 Q. What was the application you used?

20 A. At the time we are using Oracle, GMC at the
21 time, Card One I believe it was at the time, and Oracle.
22 And UNIX system for the database.

23 Q. You weren't actually doing the programming? You
24 were doing the data entry into these programs?



1 A. Correct.

2 Q. So there was a menu that you'd go into and
3 fields you'd have to fill out?

4 A. Yes.

5 Q. How would you know what information to put into
6 these fields?

7 A. I would receive that from the client. It was
8 just information on who was being admitted.

9 Q. So in other words, your manager or the client
10 might say Jim Jones is coming today and we need him to
11 have his card activated?

12 A. Correct.

13 Q. Then you would take Jim Jones' information, and
14 if he had a card number, you would take that information,
15 you'd put it into the system and say allow Jim Jones to
16 enter this building today?

17 A. Yes.

18 Q. I'm giving you an example, but that's the kind
19 of thing that you would do?

20 A. Yes, that's the kind of thing I would do.

21 Q. On top of that you would also attach these card
22 readers to wires that the telecommunications people had
23 set up for you to attach?

24 A. Yes.



1 Villanova University, and Wesley College?

2 A. You say "specialty." What do you mean?

3 Q. Any other, let's say, post-high school courses
4 or training.

5 A. Any?

6 Q. Yeah.

7 A. I've taken a lot. I've attended a Dazel course
8 on behalf of CSC, a certificate course.

9 Q. Was that in Texas?

10 A. Yes.

11 Q. Okay.

12 A. I've attended in St. David's an MCSC course, a
13 Microsoft certification course.

14 Q. Where was that?

15 A. That was in St. David's.

16 Q. When was that?

17 A. I think that was '98, 1998. I'm not sure.

18 Q. Who paid for that?

19 A. Or '99.

20 I did.

21 Q. How much did you pay?

22 A. It was a couple thousand dollars. I don't
23 remember the exact amount.

24 Q. That was to be certified -- that was to be --



1 A. It was a certificate training.

2 Q. Certificate training in what?

3 A. In Microsoft, certify engineer, MCSE.

4 Q. Anything else?

5 A. I did several -- I don't know if you considered
6 this, but I did several computer-based trainings at CSC.

7 Q. Is that CBT?

8 A. CBT, yes.

9 Q. Those are courses that Computer Sciences
10 Corporation --

11 A. Has on-line.

12 Q. Those are on-line courses?

13 A. Yes.

14 Q. They don't cost any money?

15 A. Not to me. I don't know what it costs CSC.

16 Q. Anything else?

17 A. I've taken customer service courses.

18 Q. When were those?

19 A. I don't remember.

20 Q. Was that while you were at CSC?

21 A. Yes.

22 Q. CSC paid for those courses?

23 A. Yes.

24 Q. Were they in-person or were they on-line?



1 Q. What is Dazel?

2 A. Dazel is an output server that generally manages
3 output from any location, from almost any format, at
4 least at the time that I was working with it. I don't
5 know what it does today.

6 Q. Is it a software program?

7 A. It is a software program, yes.

8 Q. Again, I'm not a technology person, so I'm
9 struggling to understand these terms.

10 But this software program runs on a
11 computer?

12 A. It runs on servers and you can administer via
13 computer, yes.

14 Q. So it runs on a server and then you can access
15 that server through a computer?

16 A. Correct.

17 Q. You took this certification course to learn how
18 to operate the Dazel software?

19 A. Correct.

20 Q. The purpose of the Dazel software is to allow --
21 you say "output," but does that mean printing to be
22 performed?

23 A. Yes, yes.

24 Q. So it allows one computer to send a job to the



1 printer and then to report back that the print job has
2 been done?

3 A. Yes.

4 Q. You don't actually program Dazel? The Dazel
5 program is already done; is that correct?

6 A. That's incorrect. I built Dazel at the time.

7 Q. Explain that to me. I thought Dazel was a
8 product.

9 A. It is a product. Out of the box it's just a
10 server. In order for that server to perform for the
11 client, you have to set it up to perform to the specs
12 that the client needs.

13 Q. So is it fair to say what you do is you take
14 this Dazel software and you have to implement it?

15 A. That's fair.

16 Q. You have to, I guess, integrate it into the
17 customers' or the clients' system?

18 A. Yes.

19 Q. That means that you have to get the Dazel server
20 to talk to the computers that the company has?

21 A. Generally, yes.

22 Q. Is there a programming language that you do this
23 in?

24 A. It's done in several different languages. So it



1 each one of these have their own separate language and
2 anybody who uses them finds one more usable than the
3 other, so -- but you have to use them -- it depends on
4 the client which one you use.

5 Q. Now, where did you learn how to use Shell?

6 A. On the job.

7 Q. Which job was that?

8 A. I used Shell prior to CSC when I was actually
9 working for the United States government many, many years
10 before that, but it had changed so much. I learned a lot
11 more working at CSC using Shell.

12 Q. What position did you learn how to use Shell at
13 CSC?

14 A. I first discovered they were using Shell when I
15 was at the help desk, but I didn't have to use it often.
16 I just had to help troubleshoot with it.

17 Q. But you said you didn't have to use it a lot?

18 A. No, because when you are at the help desk, you
19 simply take calls from customers who are having problems
20 and you try to troubleshoot.

21 Q. So you didn't program in Shell?

22 A. No.

23 Q. You said you learned really how to use Shell in
24 a position at CSC. What position was that?



1 "QUESTION: So is that when you started
2 learning how to use Shell, or was it later on
3 when you were transferred?")

4 BY MR. SEEGULL:

5 Q. So you began to really learn how to use Shell
6 when you went into the Managed Print function and started
7 working for Derek Alston?

8 A. Yes.

9 Q. You mentioned that you had learned of Shell when
10 you worked for the Social Security Administration?

11 A. Yes.

12 Q. Was that in your position that we talked about
13 earlier?

14 A. As a grants processor, fiscal technician.

15 Q. You didn't program in Shell --

16 A. No.

17 Q. -- or UNIX?

18 A. I just had knowledge of it.

19 Q. We were talking about Shell, but is that also
20 true for UNIX and Perl and Dazel, that all of those
21 things you learned on the job once you started working
22 for Derek Alston?

23 A. No, that's not true.

24 Q. Tell me when, if at all, you learned any of



1 those programs before you worked for Mr. Alston.

2 A. I used UNIX when I worked for the University of
3 Pennsylvania. A lot of their systems ran on UNIX at the
4 time.

5 Q. Okay.

6 A. And Perl I learned while working for Derek. And
7 Shell I've used off and on through the years.

8 Q. I thought Shell you learned when you worked for
9 Derek.

10 A. I learned to use it more efficient. I didn't
11 have to use it much prior to that.

12 Q. So tell me about your experience with UNIX prior
13 to working with Mr. Alston. Was it only at the
14 University of Pennsylvania?

15 A. Yes.

16 Q. In which position was it that you had to work
17 with UNIX?

18 A. Both positions I held there.

19 Q. Did you do any programming in UNIX --

20 A. No.

21 Q. -- or was it just applications?

22 A. Application usage.

23 Q. When you went to work for Mr. Alston, was that
24 when you started programming in UNIX?



1 A. I did research on the web and CSC came up into
2 my e-mail one day with a position and I applied.

3 (Defendant's Exhibit 4 was marked for
4 identification.)

5 BY MR. SEEGULL:

6 Q. I am now showing you what has been marked as
7 Defendant's Exhibit 4. I believe it's your application
8 for employment at CSC; is that correct?

9 A. Yes.

10 Q. You filled this out?

11 A. Yes.

12 Q. That's your handwriting from the front page
13 until the last page?

14 A. Yes, it is.

15 Q. You completed this in October of 1997?

16 A. Yes.

17 Q. And everything on here is true and accurate?

18 A. Yes.

19 Q. If you turn to the second page of Exhibit 4, the
20 first substantive page of the application --

21 A. Yes.

22 Q. -- you'll see at the bottom there it asks you to
23 list all of your proficiencies?

24 A. Yes.



1 Q. You see that you did not list UNIX, Perl, Dazel,
2 or Shell; correct?

3 A. Yes.

4 Q. Is that because they were not proficiencies when
5 you were applying for employment at CSC; correct?

6 A. Correct.

7 Q. Did you read this document before you submitted
8 it to Computer Sciences Corporation?

9 A. Yes.

10 Q. You knew that if you were hired you would be an
11 at-will employee?

12 A. Yes.

13 Q. Which meant that you could be terminated at any
14 time for any reason with or without cause or notice?

15 A. Yes.

16 Q. You knew that there was no promise or guarantee
17 that your employment would continue for a definite period
18 of time?

19 A. Yes.

20 Q. What position were you applying for?

21 A. At this time I was applying for the help desk
22 position.

23 Q. Did you know what a help desk person did?

24 A. Yes.



1 Q. What were you told about the position you were
2 applying for?

3 A. I don't remember everything I was told. I know
4 it was a position opened at the help desk. I know it
5 required me to answer phones, talk to customers, and I
6 knew it required me to troubleshoot applications. And at
7 the time the client was DuPont. I don't remember all
8 that was discussed.

9 Q. Did they tell you what skills you'd need to have
10 in order to work as -- what was the position title?

11 A. It was technical systems analyst.

12 Q. Did they tell you what skills you would need to
13 have for a technical systems analyst?

14 A. They -- not -- no. They just asked me what
15 skills I did have and we talked about that.

16 Q. Who made the decision to hire you?

17 A. I don't know, but I believe the offer letter
18 came from Dawn or Nancy. I'm not sure who made the
19 decision.

20 (Defendant's Exhibit 5 was marked for
21 identification.)

22 BY MR. SEEGULL:

23 Q. I am now showing you what has been marked as
24 Defendant's Exhibit 5. Do you recognizes this?



1 A. Yes.

2 Q. What is it?

3 A. What is it?

4 Q. Yes.

5 A. It's the offer letter I received.

6 Q. It was actually signed not by Dawn, but by Jerry
7 Flowers?

8 A. Yes.

9 Q. Who is Jerry Flowers? Do you know?

10 A. At the time I didn't, but I know who Jerry is
11 now.

12 Q. Who is Jerry?

13 A. He worked for the human resource department.

14 Q. Your position that they were offering you was as
15 a Member Technical Staff B?

16 A. Yes.

17 Q. What's abbreviated as an MTSB?

18 A. Yes.

19 Q. What is an MTSB?

20 A. It's just a Member Technical Staff B. It was
21 what I was hired as.

22 Q. That's a level within the company?

23 A. It was -- it is a position. I don't know that
24 it's a level. B is the level, I guess, because they had



1 Member Technical Staff A and B. So I was hired as a
2 Member Technical Staff B.

3 Q. Which is the lower of the two?

4 A. Yes.

5 Q. Those are grades within the company, Member
6 Technical Staff B, Member Technical Staff A; correct?

7 A. I think they are levels. I don't know that they
8 are grades.

9 Q. So one level within the company is Member
10 Technical Staff B, the next level up is Member Technical
11 Staff A?

12 A. Mm-hmm.

13 Q. Yes?

14 A. Yes, yes.

15 Q. The next level up is the senior level of
16 technical staff?

17 A. Yes.

18 Q. And that's an SMTS?

19 A. Yes.

20 Q. Do you know what the next level up is from SMTS?

21 A. No.

22 Q. Do you know what the level is beneath MTSB?

23 A. No.

24 Q. Are there levels beneath MTSB?



1 A. I don't know.

2 Q. Are there levels above SMTS?

3 A. I don't know. I assume there are because there
4 are managers. I assume they are above that.

5 Q. You were given an annual salary when you started
6 of \$41,000?

7 A. Yes.

8 Q. This was approximately six to \$8,000 more than
9 you had been earning at the University of Pennsylvania?

10 A. Approximately, yes.

11 Q. You believe that was a fair starting salary?

12 A. Yes.

13 Q. At the time that you were hired, the highest
14 degree that you had obtained was a high school diploma;
15 is that correct?

16 A. That's correct.

17 Q. That's true today, as well; correct?

18 A. Yes.

19 Q. You read this letter before you signed it?

20 A. Yes.

21 Q. That's your signature and you signed it on
22 November 5th of 1997?

23 A. Yes.

24 Q. You were provided documents when you started



1 to \$49,345.92 in May of 2001?

2 A. Yes.

3 Q. That was a merit increase with a raise?

4 A. It says "Merit Increase" with -- I guess that's
5 supposed to be raise. It says an "R."

6 Q. But, in fact, you received again about a \$3,000
7 raise in May of 2001?

8 A. Yes, approximately.

9 Q. Then in September 2002 it shows not that there's
10 a raise, but it shows that there was a termination, a
11 voluntary termination due to health.

12 A. That's what it shows, yes.

13 Q. That's what it shows. I understand you may not
14 know down to the last penny what you earned, but you are
15 not disputing the numbers that I just read to you?

16 A. No, I'm not.

17 Q. Those accurately reflect what your raises were
18 and what your salaries were?

19 A. I believe so, yes.

20 Q. And the dates of your raises and promotion?

21 A. Yes.

22 Q. In May of 2000 when you received your promotion,
23 you went from an MTSB to an MTSA; correct?

24 A. Yes.



1 A. No.

2 Q. Do you know what the costs were for any of those
3 benefits?

4 A. I don't remember. I know a certain amount came
5 out of my check for those, but I don't remember what the
6 total cost was.

7 Q. Do you know if the company contributed on your
8 behalf to the 401(k) plan?

9 A. I believe they matched. At least that's -- they
10 matched at a certain percentage. I don't remember the
11 rules, but a certain percentage you would request they
12 would match.

13 Q. Let's talk about the first position you held at
14 CSC and that was as a help desk technician. Do you
15 Member Technical Staff B?

16 A. Yes.

17 Q. Can you explain in some detail what you did as a
18 help desk technician?

19 A. I answered calls, calls from the client which at
20 the time was DuPont. I could get calls on desktop,
21 problems that a customer might be having, printer
22 problems, connection to the server problems,
23 telecommunication problems, phone issues.

24 Q. This is a customer calling into a CSC help



1 Q. Did you ever have to go out and visit the
2 customer?

3 A. Yes, but not right away. Maybe once or twice.
4 Not often. That wasn't a policy of the help desk at all.

5 Q. Was it mostly software problems or hardware
6 problems?

7 A. It was both. It was both. One call -- one
8 minute it could be about software and the next call could
9 be about hardware.

10 Q. You didn't use Dazel while you were on the help
11 desk?

12 A. No.

13 Q. Or Perl?

14 A. No.

15 Q. Or Shell?

16 A. No. Well, I'm just aware of them.

17 Q. Or UNIX?

18 A. No. Well, I had to use UNIX.

19 Q. I'm sorry. What was the last thing?

20 A. I was just aware of those software packages. I
21 didn't have to use them to troubleshoot.

22 Q. The same thing is true of UNIX?

23 A. No. I had to use UNIX.

24 Q. Because the application was running on UNIX?



1 A. Yes.

2 Q. What was the application called that was running
3 on UNIX?

4 A. They had a number of applications, but, I
5 don't -- we did our tickets at the time called PQRs that
6 was one system, but in the background we had something
7 that DuPont used, UNIX and VAX. So by using them, I
8 would remotely log into the UNIX or VAX system if that
9 was the customer's issue.

10 Q. But again, you wouldn't do any programming on
11 UNIX in this position?

12 A. No, no.

13 Q. By the way, do you have a home computer?

14 A. Yes.

15 Q. How long have you had a home computer?

16 A. Awhile now. I'm not sure. Several years.

17 Q. You've never run UNIX at home?

18 A. No. I have a UNIX test software, but I don't
19 run UNIX at home. When I did pager duty, I could log
20 into my UNIX systems, but I don't run it from -- I run on
21 Microsoft at home.

22 Q. So you've never done programming of UNIX at
23 home?

24 A. Yes. The training piece of it. I have a test



1 UNIX software.

2 Q. Are you --

3 A. I didn't have to do it for the job on my home PC
4 unless I was working from home.

5 Q. So in other words, occasionally you would work
6 on UNIX when you were in the Managed Print group --

7 A. Yes.

8 Q. -- at home?

9 A. No, no.

10 Q. Maybe I'm confused.

11 I thought what you said was you didn't use
12 UNIX at home unless you were logging on --

13 A. That's correct.

14 Q. -- to the work computer?

15 A. Yes.

16 Q. When would you need to log on to the work
17 computer from home?

18 A. From home? When I was on pager duty. We had
19 something called pager duty. It was rotated between the
20 team members.

21 Q. When you were on pager duty, was that when you
22 were customer service or is that when you were in the
23 Managed Print group?

24 A. In the Managed Print group.



1 Q. Did you ever supervise any employees when you
2 worked at the help desk?

3 A. I was the backup lead for a team at the time.

4 Q. But you were never a supervisor?

5 A. I was never a supervisor.

6 Q. Who was your first direct supervisor at the help
7 desk?

8 A. Direct supervisor, I believe it was Dawn, I
9 think, I reported to directly.

10 Q. How about Nancy Riggins, does that name ring a
11 bell?

12 A. Yes, Nancy Riggins does ring a bell. She was, I
13 believe, my teammate.

14 Q. Does she report to Dawn?

15 A. I believe she reported to Dawn.

16 Q. How was Nancy Riggins as a supervisor or team
17 leader?

18 A. She was wonderful. I liked working for Nancy.

19 Q. Above her was Dawn?

20 A. I believe so, yes.

21 Q. The last name is H-a-u-c-k?

22 A. Yes.

23 Q. How was Dawn as a supervisor?

24 A. She was wonderful. No problems.



1 Q. They were supportive of you?

2 A. Yes.

3 Q. Your next supervisor was Sharon Walling?

4 A. Yes.

5 Q. How was Ms. Walling as a supervisor?

6 A. She was fine. I didn't have any problems with
7 Sharon that I can recall.

8 Q. Am I right that you didn't have any problems
9 with any of your supervisors until Dawn Dworsky?

10 A. That's a fair statement.

11 Q. Do you remember what your hours were when you
12 were a help desk technician?

13 A. We were always 40 hours, but we would stay over
14 when needed. We would stay late if needed.

15 Q. Did you get overtime if you stayed late?

16 A. No.

17 Q. You received performance evaluations every year
18 you were at the company; correct?

19 A. I didn't understand the question.

20 Q. I'm sorry. You received performance evaluations
21 each year you were at the company?

22 A. Yes.

23 (Defendant's Exhibit 10 was marked for
24 identification.)



1 Q. How were you measured in the Managed Print
2 group?

3 A. I guess by my duties, my performance.

4 Q. How did they measure your performance?

5 A. I don't know until appraisal time when they went
6 to sit down and discuss things with me.

7 Q. So is it fair to say that what they do is they
8 would look at how well you handled customer calls?

9 A. I guess it would be fair to say, yes.

10 Q. It's much more subjective in the Managed Print
11 group than it was in the help group?

12 A. I don't know. What do you mean?

13 Q. I would just guess that if there's escalated
14 calls, that means there are more technical problems that
15 require more sophisticated analysis, and it's difficult
16 to have objective measures for how many calls you're
17 handling in an hour, for instance.

18 A. I guess that's fair.

19 Q. In other words, it takes more skills in the
20 Managed Print group than it did in the help desk area?

21 A. It would be good to have those skills at the
22 Managed Print. I don't think you could do the job
23 without having certain skills, yes.

24 Q. I mean, isn't that why it's called an escalated



1 A. Even if it's the same call.

2 Q. It just depends on who handles it?

3 A. It depends on who handles it.

4 Q. Now, when you went over to the Managed Print
5 group, you had to use your UNIX?

6 A. Yes.

7 Q. And you had to use Dazel?

8 A. Yes.

9 Q. Or did you not use Dazel until later at some
10 point?

11 A. At some point I did use Dazel, yes.

12 Q. Before you had to use Dazel, did you have to use
13 Shell and Perl?

14 A. Yes, I had to use Shell. Not Perl. I used Perl
15 along with Dazel.

16 Q. So Perl goes along with Dazel?

17 A. Correct.

18 Q. Shell and UNIX started from beginning in the
19 Managed Print group?

20 A. Yes, yes.

21 Q. You programmed in those languages?

22 A. I programmed as well as I had to analyze
23 problems with those languages.

24 Q. Now, how did you learn how to program in UNIX



1 Q. When did you start taking CBT courses?

2 A. From the time I was hired at CSC. It was a
3 requirement. I took them at the help desk, as well.

4 Q. But you didn't take UNIX CBT courses until you
5 came over to the Managed Print group; correct?

6 A. I think so. That's when I took my first UNIX
7 when I was in the Managed Print group.

8 Q. Do you know when you took it?

9 A. No.

10 Q. Do you know exactly which CBT courses you took?

11 A. I took a lot, so I don't remember.

12 Q. Who would have records of which CBT courses you
13 took?

14 A. I believe whoever the manager was at the time I
15 took them. They received an e-mail that I took the
16 course.

17 Q. Would there be records from CSC that would
18 reflect which courses you took and when?

19 A. There should be.

20 Q. You don't recall which courses you took and
21 when?

22 A. No. I know I took a lot. I don't remember
23 when.

24 Q. Do you remember any specific courses you took?



1 ask someone.

2 Q. And they would help you?

3 A. Yes.

4 Q. How was Derek Alston as a supervisor?

5 A. He was wonderful.

6 Q. You got along with him well?

7 A. Yes.

8 Q. Did you have a lot of direct contact with him,
9 or because he was in a different building or for other
10 reasons is he not somebody that you spoke to often?

11 A. I spoke to him. I don't know what you consider
12 "often," but I spoke to him on the phone.

13 Q. How often did you speak to him?

14 A. I don't know. Whenever I needed to. Sometimes
15 he would call. I don't know how many.

16 Q. Once a week? Once a month?

17 A. I wouldn't say once a week, no. It wasn't on a
18 regular basis like that, but it was several times a
19 month.

20 Q. It wasn't always over the phone?

21 A. Primarily. I had to meet with him in person
22 sometimes.

23 Q. When would you have to meet with him in person?

24 A. Any time he would ask. His discretion.



1 A. Yes.

2 Q. You wrote: "MaryAnne introduced me to all the
3 Manage Print menus, various UNIX commands and how to find
4 assistance via an on-line UNIX manual, and explained some
5 of the history of the team."

6 A. Yes.

7 Q. Is that correct?

8 A. That's correct.

9 Q. That's what she did?

10 A. Yes.

11 Q. Then you see the last bullet point on the
12 page --

13 A. Yes.

14 Q. -- where it says: "set-up a schedule to train
15 at least 1 hour daily with MaryAnne going over manage
16 print UNIX commands, troubleshooting print servers,
17 etc."?

18 A. Yes, I do.

19 Q. If you go to the next page, you see "Week 4"?

20 A. Yes.

21 Q. If you look at the fourth bullet point down, do
22 you see you wrote that you want to "continue learning and
23 working with UNIX"?

24 A. Yes.



1 Q. Then the fifth bullet point, "practice using
2 UNIX command line on lsv9"?

3 A. Yes.

4 Q. All that's true?

5 A. Yes.

6 Q. Then in Week 5, the first bullet point was to
7 "train more extensively with MaryAnne on utilizing
8 Dazel"?

9 A. Yes.

10 Q. That's true, as well?

11 A. Yes.

12 Q. So it is true that Mrs. Doll-Johnson trained you
13 on UNIX when you first joined the Managed Print group?

14 A. She trained me on a lot of UNIX, yes.

15 Q. She also trained you on Dazel?

16 A. She was one of the persons, yes.

17 Q. Who were the other people that trained you on
18 Dazel?

19 A. Peter Lang, he was an employee, but he was
20 stationed in Europe. He was very efficient in Dazel, as
21 well.

22 Q. Was there anybody else that trained you in UNIX
23 or Dazel?

24 A. No.



1 A. I don't think she was a good supervisor at all.

2 Q. You didn't like her management style?

3 A. I didn't like her management style.

4 Q. What didn't you like about her management style?

5 A. She wasn't fair.

6 Q. In what way wasn't she fair?

7 A. In the way that she treated me.

8 Q. How was she not fair in the way that she treated
9 you?

10 A. She didn't recognize me as a person within her
11 group. Only if I requested meetings with Dawn would I
12 have a meeting with Dawn. And that was after several
13 requests.

14 Q. So you felt she should meet with you more often?

15 A. As her employee, she should have time to meet
16 with me, yes.

17 Q. How often did you want to meet with her?

18 A. Whenever requested. I don't plan to meet with a
19 supervisor unless I need to.

20 Q. So you needed to meet with her a lot more often
21 than she met with you?

22 A. If I sent a request, that's when I needed to
23 meet with her.

24 Q. How many times did you request to meet with her?



1 A. Several. I don't know exactly the number.

2 Q. Would it be less than five?

3 A. I don't know. I don't remember. Several.

4 Q. Several times during the time that you were
5 managed by her you requested to meet with her?

6 A. Yes.

7 Q. You're saying that you had to request several
8 times for her to meet with you?

9 A. Yes.

10 Q. Eventually she would have?

11 A. Yes.

12 Q. But you felt she should have met with you
13 immediately?

14 A. Not immediately because I didn't know her
15 schedule. Not immediately.

16 Q. What do you feel should have happened?

17 A. She should have responded at some point other
18 than several requests later.

19 Q. Instead of having you to ask her three times or
20 several times to meet, she should have met with you or
21 arranged a time to meet with you right away?

22 A. Yes.

23 Q. Now, do you know if she treated others
24 differently or do you know if other people had similar



1 concerns and problems meeting with her?

2 A. I don't think anyone had any of the same
3 problems that I had because I was the only
4 African-American in the group.

5 Q. Do you know if others requested to meet with her
6 several times?

7 A. That I don't know.

8 Q. Do you know how many times she met with other
9 people in the group?

10 A. That I don't know.

11 Q. Why don't you know that?

12 A. I wouldn't know that.

13 Q. You mean because you weren't a supervisor?

14 A. No, I was not.

15 Q. Who was the supervisor of Miss Dworsky?

16 A. It changed several times. I believe Mike Suman
17 was her supervisor. There was several people, but I
18 remember Mike.

19 Q. Did you have any contact with Mr. Suman?

20 A. At some point, yes, I did.

21 Q. How many times?

22 A. I may have met with Mike maybe three or four
23 times, approximately.

24 Q. Tell me about those meetings.



1 to do your job well?

2 A. Yes.

3 Q. Didn't he also tell you to set up a plan, have
4 goals?

5 A. Yes, he did.

6 Q. Didn't he tell you to try to meet monthly with
7 Miss Dworsky on the movement of your plan?

8 A. Yes, he did.

9 Q. Did you do that?

10 A. I tried.

11 Q. But she refused to meet with you?

12 A. She didn't really reply at all. I can't say she
13 refused because she didn't really like to communicate
14 with me.

15 Q. Do you know if she met monthly with any of the
16 employees?

17 A. No, I do not.

18 Q. You liked Mr. Alston's management style?

19 A. Yes, I did.

20 Q. You did not like Miss Dworsky's management
21 style?

22 A. That's correct.

23 Q. Mr. Alston would meet with you more often than
24 Miss Dworsky?



1 A. Yes, he did.

2 Q. How often did he meet with you?

3 A. I don't remember, but more so. And I didn't
4 have to request several times. He would contact me as my
5 manager.

6 Q. That's what you considered to be the
7 discrimination?

8 A. No, that's not -- no, not at all.
9 Discrimination, Dawn discriminated against me.

10 Q. No, no. But in other words, Derek would meet
11 with you more often?

12 A. That's not the discrimination for me, no. Derek
13 did meet with me more often, yes.

14 Q. After Miss Dworsky became your supervisor, your
15 job didn't change in any substantial way, did it?

16 A. No, not in any substantial way.

17 Q. Your duties continued to be the same?

18 A. That's correct.

19 Q. Do you know if Miss Dworsky's expectations
20 changed?

21 A. I found out her expectations changed when I had
22 a meeting with her and Maureen Summers.

23 Q. How were her expectations different than
24 Mr. Alston's?



1 Q. Now, did you agree with this evaluation?

2 A. Yes, I did, with objections, and I think I noted
3 them. Let's see. Actually, I didn't. No, I didn't.

4 Q. You didn't have any objections to this
5 evaluation?

6 A. Yes, I did. That's why I didn't sign it.

7 Q. Didn't we go through this? You just have to
8 approve the form; correct?

9 A. That's correct, and I hadn't approved it.

10 Q. Why didn't you approve it?

11 A. Because I didn't agree with Dawn's evaluation at
12 all.

13 Q. You didn't think you were good?

14 A. I thought I was better than good.

15 Q. You thought you deserved better than good?

16 A. That's correct.

17 Q. This was the same rating that you had received
18 on your first two evaluations from Miss Hauck and
19 Ms. Walling?

20 A. I believe so.

21 Q. You received an increase in pay at this time;
22 correct?

23 A. Yes, I did.

24 Q. Your increase in pay by 5 percent; correct?



1 Q. Well, forget what's in there. When you met with
2 her --

3 A. No.

4 Q. -- what did she tell you when you met with her?

5 A. When I met with her, she said that I was doing a
6 great job, that I should continue on the path that I'm
7 going, that I'm really focused, I'm a good worker, I have
8 good work ethic. And she explained to me that I was
9 getting a category 3 rating and she explained to me why.
10 And that's when I explained to her I didn't agree with
11 her assessment.

12 Q. Did she tell you that you needed to improve your
13 decision-making capacity?

14 A. No.

15 Q. Did she tell you that if you exceed your
16 performance expectations more consistently, then you
17 might be promoted to an SMTS?

18 A. No.

19 Q. Did she tell you anything about when you would
20 or whether or not you would be promoted to an SMTS?

21 A. No, not particular -- not precisely, no. What
22 she said to me was I didn't get promoted because there
23 were some guidelines and she can only promote X amount of
24 people. That was what she said. She didn't give me any



1 agree.

2 Q. But all of your conversations were about the
3 performance appraisal and about the job expectations?

4 A. No. They included a lot more.

5 Q. What else did they include?

6 A. We included the job, the expectations, the
7 salary.

8 Q. Let's talk about your conversations about
9 salary. Tell me about your conversations about salary.

10 A. At some point we had a conversation about salary
11 and I was told by Dawn and Sonia that I would get a
12 salary increase and at some point --

13 Q. Who said that?

14 A. Both.

15 Q. Dawn and Sonia?

16 A. Yes.

17 Q. What did they say?

18 A. Well, they said I would receive a salary
19 increase, a salary adjustment.

20 Q. When?

21 A. They did not say when.

22 Q. Did they say why they would give you a salary
23 adjustment?

24 A. Well, Dawn said it was because I was -- I forget



1 her exact terminology -- I was unfairly and unjustly or
2 impropportionate to the other members of the team
3 salary-wise.

4 Q. What did she mean by that?

5 A. I don't know what she meant by it, but that's
6 what she said.

7 Q. Did you ask her what she meant by that?

8 A. No.

9 Q. What did Sonia say about salary adjustment?

10 A. Sonia at some point also said I would receive a
11 salary increase or an adjustment.

12 Q. Did she say why?

13 A. No. Just something she agreed that I needed to
14 have she said.

15 Q. Did she say when it would happen?

16 A. No.

17 Q. Did you discuss or did they mention how much
18 this salary adjustment would be?

19 A. No.

20 Q. Didn't you want to know?

21 A. Yes.

22 Q. Did you ask them?

23 A. Yes.

24 Q. What did they say?



1 Q. Is that correct?

2 A. That's correct.

3 Q. You said you had conversations with Mike Suman?

4 A. Yes, I had.

5 Q. How many conversations did you have with him?

6 A. Not many. Maybe two or three.

7 Q. Tell me about those conversations.

8 A. They were with regard to at some point Dawn
9 wanted me to do a Dazel manual, to write a Dazel manual,
10 which I was assigned to do, and at that point all the
11 engineering projects I was working on were taken away.
12 And we met with Mike because I did not believe in a
13 statement that Maureen and Dawn said to me that the
14 projects were complete.

15 And so I met with Mike and Dawn at
16 Maureen's request to resolve that issue. And when I went
17 into the meeting, we discussed pretty much Mike saying
18 whatever Dawn says is it and anything discussed prior to
19 that is erased, it does not count, it does not matter.

20 Q. I'm not following you, so you are going to have
21 to help me out.

22 First of all, what is a Dazel manual?

23 A. It's something I had to write.

24 Q. What is it?



1 manual.

2 Q. So Mike Suman and Dawn told you that?

3 A. Correct.

4 Q. They said the only projects left for you is the
5 Dazel manual?

6 A. Correct.

7 Q. When was this that they said this?

8 A. I don't know. I don't recall.

9 Q. Was this when you were coming back from your
10 leave?

11 A. It's possible, yes.

12 Q. Did they say that your other engineering
13 projects had been reassigned to other employees?

14 A. No. They said they were complete.

15 Q. How do you know they weren't complete?

16 A. I was still receiving e-mails on those same
17 projects.

18 Q. Which projects were not complete?

19 A. I don't recall them all, but there were several.

20 Q. Do you recall any of them?

21 A. There was a DDE project.

22 Q. DDE?

23 A. Yes.

24 Q. What does that stand for?



1 Department of Labor and asked what I should do and I
2 filed a complaint. And speaking with the investigator,
3 she told me in future communications with people at CSC
4 that I should be very clear about the problems that I was
5 having.

6 So that's what I was from that point on, I
7 was clear to tell Dawn if she was discriminating against
8 me or if I didn't agree with something she said. Or if
9 the work environment was making me sick, I would tell
10 them. Or if I was being isolated, I would tell them.
11 And we would have meetings and it would just remain the
12 same.

13 Q. So before you went to the Department of Labor,
14 are you saying that you didn't address things in that
15 direct a manner, but after you got this advice, you
16 decided you were going to be more direct?

17 A. I thought I was being direct, but maybe I
18 wasn't, so she said make sure that you are.

19 Q. Did you ever say to Dawn Dworsky, I think you're
20 discriminating against me?

21 A. I said to Dawn Dworsky I thought she was biased,
22 yes.

23 Q. Is that what you said, "I think you're biased"?

24 A. Yes.



1 Q. Didn't you ask Ms. Musumeci about the salary
2 increase?

3 A. Yes, I did.

4 Q. She told you that the salary you were offered
5 was well within the applicable range of salary for that
6 position?

7 A. Something to that effect.

8 Q. You're not denying that it was within the range
9 applicable for that position; correct?

10 A. I'm not denying it because I don't know. I
11 don't know what the range was.

12 Q. Now, you rejected the offer because you felt the
13 salary increase was too low; correct?

14 A. Correct.

15 Q. Isn't it true that you demanded a salary
16 increase of 36 percent?

17 A. No, I don't recall that at all.

18 Q. Don't you recall stating that you wanted a
19 \$63,000 salary?

20 A. No, I don't recall.

21 Q. Did you ever give her a specific number of what
22 you wanted the salary to be?

23 A. No, I don't recall doing that at all.

24 Q. You never said \$63,000?



1 African Americans"; is that right?

2 A. Yes.

3 Q. He says: "'I had coffee,'" and he's recounting
4 what you said, "'I had coffee, talking to Paul about home
5 repairs.'" Does this ring a bell?

6 A. Sounds familiar, yes.

7 Q. "'Dawn came over, all dressed up.'" Sound
8 familiar?

9 A. Sounds familiar.

10 Q. "'Paul asked her whether she had a big
11 meeting.'"

12 A. Sounds familiar.

13 Q. "'She said that she was going to her son's
14 graduation at church.'"

15 A. Sounds familiar.

16 Q. "'She then asked me,'" meaning yourself, "'why
17 do Black people dress up for church and why is the music
18 so loud. I told her, I could not speak for all Black
19 people.'"

20 A. Yes, I do recall that conversation.

21 Q. Is that the whole conversation or is there more
22 to it than that?

23 A. It probably was more to it, but that's the gist
24 of it.



1 Q. Can you remember any more to the conversation
2 than what's there?

3 A. No, I can't remember.

4 Q. You found this offensive?

5 A. Yes.

6 Q. Why did you find it offensive?

7 A. Because I can't account for all black people.

8 Q. Is there anything wrong with what she said or
9 was it derogatory in any way?

10 A. I found it derogatory.

11 Q. Why is it derogatory to ask you why black people
12 dress up for church?

13 A. I can't speak for all black people.

14 Q. So you found it derogatory that she was asking
15 you the question?

16 A. I would find it derogatory if she asked any
17 person that question.

18 Q. Why is it derogatory?

19 A. Because it is a generalization of one group of
20 people.

21 Q. So is your point that some black people might
22 dress up for church and some black people might not dress
23 up for church?

24 A. I really didn't have a point. That was Dawn.



1 Q. Did you tell her you were offended by this
2 comment?

3 A. No.

4 Q. Why not?

5 A. I didn't feel the need to.

6 Q. She told you that her son was graduating -- was
7 it a black church she was going to?

8 A. I don't know.

9 Q. Who was the Paul that's being referred to here?

10 A. Paul White.

11 Q. Did you discuss with Mr. White this
12 conversation?

13 A. I don't remember. Maybe we did after the fact,
14 but not while Dawn was there.

15 Q. Did you discuss it with anybody else?

16 A. No, just Sonia, Maureen, people I'd been talking
17 with in HR.

18 Q. Let's go to the second point. It says:

19 "Miss Poland furnished another example of what she
20 considered a racially insensitive remark," and he's
21 quoting you now. "'Dawn had moved Randy, promoted him,
22 into my group. I worked with Randy on a server."

23 Who is this Randy that's being referred to
24 here?



1 A. This is Randy Miller. And I don't recall saying
2 these things, what's written here.

3 Q. So where he writes "'Randy asked what's smelling
4 here. Dawn replied to Randy jokingly, "she," meaning
5 Poland, "'smells'"?

6 A. No, I don't recall that.

7 Q. You don't recall this incident at all?

8 A. No, not like that. There was an incident, but
9 we never even spoke about it.

10 Q. Who is "we"?

11 A. Myself and Randy, or Dawn for that matter. They
12 were joking about something that day. But we didn't
13 discuss it like it's written here. We didn't discuss it
14 at all, actually.

15 Q. Tell me about the conversation you had, if
16 there's anything that's related to this or similar to
17 this.

18 A. No, there was no conversation. Dawn and Randy
19 were sitting there joking about something. But there was
20 no conversation that involved me directly.

21 Q. Was there anything about smelling?

22 A. Yes.

23 Q. Tell me about a conversation which the word
24 "smelling" came up, or "smells"?



1 A. I don't know if it was a conversation. It was
2 just gestures. Nothing --

3 Q. Tell me about whatever it was.

4 A. It was a gesture that they made, Randy made
5 something like this (demonstrating) and Dawn said a joke
6 after the fact, but I don't remember what it was.

7 Q. When did this happen? Do you remember?

8 A. No.

9 Q. When did that first comment happen about the
10 church? When did that happen?

11 A. I don't recall.

12 Q. Where were you sitting when this gesture about
13 smelling happened?

14 A. I was sitting in my cubicle. Well, in the quad
15 that we sit in.

16 Q. The quad?

17 A. Yes. Our cubicles were squared off where four
18 people sat. There were no dividers there. Just a
19 walkway.

20 Q. So was it two and two?

21 A. Two -- yes, most of the time.

22 Q. Who were the four people that sat together?

23 A. Well, I don't remember everyone, but I know I
24 sat in one cube, MaryAnne sat in another, I think Paul



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1 sat on the other side, and there was an aisle in between,
2 but I don't remember who sat here.

3 But that day we were training Randy on
4 Dazel, myself and MaryAnne, and he was in the middle of
5 us on this side.

6 Q. So --

7 A. That wasn't his normal seat, though.

8 Q. So Randy was sitting next to you during this
9 incident?

10 A. He was sitting between myself and MaryAnne.

11 Q. Normally he sat across the aisle?

12 A. I forget where Randy sat. I don't know if he
13 sat right across the aisle because we had other seats on
14 the other side of the wall.

15 Q. Or diagonal?

16 A. I don't recall.

17 Q. But this was not his normal seat, but he was
18 sitting with you and MaryAnne Doll-Johnson --

19 A. Yes.

20 Q. -- to go over something in Dazel?

21 A. Yes.

22 Q. Tell me what happened.

23 A. Dawn came down the aisle and they were talking
24 and I don't remember what they were all talking about.



1 Q. Who is "they"?

2 A. MaryAnne, Randy, and Dawn.

3 Q. You don't know what they were talking about?

4 A. I don't recall, no.

5 Q. What happened?

6 A. And Randy did a gesture and Dawn made a joke and
7 that was it. And there was no discussion.

8 Q. The gesture that Randy did was what?

9 A. Just something like that (demonstrating). I
10 don't remember the whole gesture.

11 Q. He took his fingers to his nose?

12 A. Yes.

13 Q. And just put them at his nose?

14 A. Yes.

15 Q. Just laid them underneath his nose?

16 A. Yes.

17 Q. On his upper lip?

18 A. Somewhere around there.

19 Q. He didn't say anything?

20 A. He said something, but I couldn't hear him.

21 Dawn heard him.

22 Q. So you don't know what he said?

23 A. I don't know what he said.

24 Q. You're saying Dawn then made a joke?



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1 A. Yes.

2 Q. What was the joke she made?

3 A. I didn't hear it.

4 Q. Did you hear anything she said?

5 A. No.

6 Q. Did this have any reference to you?

7 A. I believe so, but I don't know.

8 Q. Why do you believe it had a reference to you?

9 A. Because it was just us present at the present
10 time and no one there told me what it was.

11 Q. So nobody told you what they were laughing
12 about?

13 A. That's correct.

14 Q. You didn't hear it, so you didn't know what they
15 were laughing about?

16 A. That's correct.

17 Q. But you figured because they're all laughing, it
18 must be about me?

19 A. At the time, yes.

20 Q. Do you still believe that?

21 A. Yes.

22 Q. So he writes here: "'Everyone laughed, I too,
23 because I didn't get it. Later when I realized what she
24 meant, I was offended by the fact they were making a joke



1 of my perfume and body odor.'" "

2 You never said anything like that to
3 Dr. Rieger?

4 A. No, I did not.

5 Q. He made that up?

6 A. I don't know. I guess he did. I didn't write
7 it.

8 Q. You're not denying you said that to him?

9 A. I'm not denying it, but I don't recall ever
10 saying anything like that to him.

11 Q. But you might have, you might not have?

12 A. Might have, might not have. I don't think I
13 did.

14 Q. Now, are you saying there was something racial
15 about this incident, or it was just personally offensive
16 because you weren't involved in the joke?

17 A. It was something offensive there, but I don't
18 know the joke. I don't know what it was.

19 Q. So you don't know if it was racial or not?

20 A. I don't know.

21 Q. Let's go to the next incident, number 3.

22 "Miss Poland charged that in several
23 meetings with human resources, Dawn and her manager,
24 people could not understand her reaction: 'what was



1 happening to me; and get me out of this department. Dawn
2 was in charge of about 30 people, and I was the only
3 African American.'" Is that right?

4 A. It's written here, but I don't remember saying
5 it like that. It's possible. I was under a lot of
6 stress at the time.

7 Q. Looking at incident number 4, Dr. Rieger
8 recounts that you said the following, that "Miss Poland
9 reported another example of what she considered to be
10 racially insensitive remarks: 'MaryAnne said to Audrey:
11 I can see anyone can do this, black dogs and all, in
12 reference to a class action suit. That wasn't said to me
13 directly.'"

14 Do you recall that being said?

15 A. Yes, but I didn't say it was said to Audrey.
16 That was said to Randy, actually.

17 Q. So MaryAnne said to Randy "I can see anyone can
18 do this, black dogs and all, in reference to a class
19 action suit"?

20 A. Right.

21 Q. Now, were you there when this was said?

22 A. Yes.

23 Q. What is this referring to?

24 A. I don't know. Some class action they were



1 talking about.

2 Q. What did it have to do with dogs?

3 A. I don't know.

4 Q. You considered it --

5 A. That's what they said.

6 Q. You considered it insensitive because you think
7 it's really referring to black people?

8 A. I thought it was referring to me.

9 Q. Why did you think it was referring to you if it
10 is referring to a class action suit?

11 A. Because at the time they knew of the issues I
12 was having with Dawn.

13 Q. When was this statement made?

14 A. Sometime after that fact.

15 Q. Did you consider MaryAnne to be a racist?

16 A. Not up until that point.

17 Q. After that point did you consider her to be
18 racist?

19 A. I still don't consider MaryAnne to be a racist.
20 I think she's very intimidated by Dawn.

21 Q. Do you think Dawn told her to make this
22 statement?

23 A. No.

24 Q. Did you ever ask MaryAnne what she meant by



1 this?

2 A. No, I did not.

3 Q. Did you ever talk to MaryAnne about this?

4 A. No.

5 Q. Did you ever talk to anybody else about this?

6 A. Just HR.

7 Q. What did HR say about this?

8 A. Nothing.

9 Q. Did it ever happen again?

10 A. Not to my knowledge.

11 Q. Did any other statements happen?

12 A. Not that I recall.

13 Q. So did HR tell you that they would make sure
14 that no racially insensitive remarks were made?

15 A. No, they did not.

16 Q. Who did you tell in HR about this statement?

17 A. Maureen and Sonia.

18 Q. What did they say about it?

19 A. They didn't say anything.

20 Q. They just listened? They didn't say anything?

21 A. That's correct. There was no help there.

22 Q. If they testified that they told you they would
23 look into it and make sure it didn't happen again, you
24 wouldn't deny that?



1 A. No, I wouldn't.

2 Q. Let's turn to the next incident, which is number
3 5. I think we've talked about this, but I want to make
4 sure that we have.

5 Dr. Rieger recounts that you were asked
6 whether there was a proverbial straw that broke the
7 camel's back and you responded that "'the straw was, that
8 on the day I left, I received an e-mail from Dawn asking
9 me to install a server.'"

10 A. I don't remember this conversation, but it's
11 possible it took place. I don't remember these exact
12 words?

13 Q. Do you remember this incident?

14 A. Yes, I do remember the incident.

15 Q. Do you remember an incident about being asked to
16 install a server?

17 A. Yes, I do.

18 Q. Tell me about that.

19 A. I remember receiving an e-mail from Dawn to
20 install a server. I don't remember what day, but --

21 Q. Was it the day that you left?

22 A. I believe so, yes. I don't remember what server
23 it was. But it was in February.

24 Q. Of 2002?

